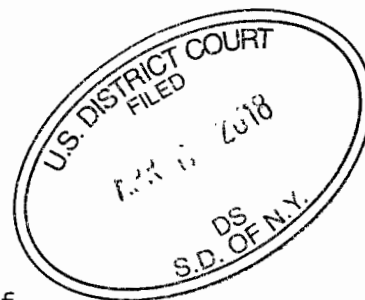


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Approved: _____

MATTHEW LAROCHE / JASON A. RICHMAN
Assistant United States Attorneys

Before: THE HONORABLE ROBERT W. LEHRBURGER
United States Magistrate Judge
Southern District of New York



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: COMPLAINT
UNITED STATES OF AMERICA :
: Violation of
: 21 U.S.C. § 963
- v. - :
: COUNTY OF OFFENSE:
VINCENT SCHIFANO, : NEW YORK
: Defendant. :
: :
----- x

SOUTHERN DISTRICT OF NEW YORK, ss.:

KEN SAUNDERS, being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration ("DEA"), and charges as follows:

COUNT ONE
(Narcotics Importation Conspiracy)

1. From at least in or about November 2017, up to and including in or about April 2018, in Colombia and elsewhere, and in an offense begun outside of the jurisdiction of any particular State or district of the United States and for which one of two or more joint offenders will be first brought to and arrested in the Southern District of New York, VINCENT SCHIFANO, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that VINCENT SCHIFANO, the defendant, and others known and unknown, would and did import into the United States and into the customs territory of the United States from a place outside thereof a controlled substance, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).

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Meeting").³ This meeting was audio and video recorded. Based on my review of those recordings and my conversations with CS-1, I know that during the course of the December 7 Meeting, the following occurred, in substance and in part:

i. SCHIFANO told CS-1 that he "had these friends in Colombia for a long time who are telling me that there are some friends here in the United States" who needed help with cash and banked money they wanted to deliver to Colombia. CS-1 informed SCHIFANO that "[t]he money comes from . . . from New York, it's ours." CS-1 asked SCHIFANO if he knew CC-1 and other members of the Colombian DTO, and SCHIFANO replied affirmatively, stating that he "spent three months in Colombia" as part of a "supposed 120 million dollar operation" for which they "got a plane ready in Panama."

ii. CS-1 told SCHIFANO that "[w]e're buying 10,000 kilos from him out of Cali. . . . We don't want problems because we work with a very dangerous cartel. We did a test with the dealer, we bought five packages. It arrived in New York, the test was run, everything was fine. The people are happy with the . . . with the merchandise." Based on my training, experience, and discussions with CS-1, I understand that when CS-1 stated "five packages" he was referring to the five kilograms of cocaine the Colombian DTO had provided to the CSes, as referenced above in paragraph 6.⁴

iii. SCHIFANO then asked CS-1 "[t]o deliver it in Colombia, how would you want it, banked or cash?" CS-1 responded by asking if the Colombian DTO had told SCHIFANO its preference, and SCHIFANO stated that they were "talking about cash to begin with." SCHIFANO then stated that he had government approval for a project through which he could send 120 million dollars, for "contracts [that] are approved by the government, authorized," and through which he could hide the payments from CS-1. Later on, SCHIFANO noted that he was making

³ The December 7 Meeting, and the below-described meetings, took place in Spanish. The quotations and summaries contained herein are draft translations prepared by a certified interpreter and are subject to further review.

⁴ Based on my participation in this investigation, I know that those kilograms of cocaine were delivered to CS-1 by a Colombian DTO member on or about November 1, 2017, during a video-recorded meeting in Colombia, and are currently in DEA custody.

a second presentation for an oil pipeline project in Colombia, and if he won the bid he would have "approval to deliver 300 million dollars, then I can play the game the way I want."⁵

iv. CS-1 and SCHIFANO proceeded to discuss particulars of SCHIFANO's plan to transport payments from CS-1 and his purported cartel to the Colombian DTO. SCHIFANO told CS-1 that they "want[ed] 100 percent cash for the first operation, in Colombia ... 50 percent in pesos and 50 percent in dollars." He then stated that he wanted to sit down with the Colombian DTO members, and would be willing to "catch a plane to Bogota Monday" to determine the particular member of the Colombian DTO to whom he was sending the payments from CS-1. SCHIFANO then stated that he was 62 years old and had "been doing this for 20 years of my life." Finally, SCHIFANO stated that he had been laundering money "for so long with the Italians, with the Russians," and would not be left "holding the suitcase" if the Colombian DTO ran away with CS-1's money. SCHIFANO also noted that he had lived in Russia for a time.

b. On or about February 8, 2018, CS-1 and another confidential source ("CS-2"⁶) met with CC-1 and a co-conspirator not named as a defendant herein ("CC-2") at CC-2's home in Bogota, Colombia (the "February 8 Meeting"). The February 8 Meeting was video and audio recorded. During the course of the February 8 Meeting, the following occurred, in substance and in part:

i. CS-1, CS-2, CC-1, and CC-2 continued to negotiate the purchase of approximately 10,000 kilograms of cocaine. They also discussed "Vincent," an apparent reference to SCHIFANO.

⁵ Based on my training, experience, and involvement in this investigation and others, I believe that SCHIFANO was informing CS-1 that if he was granted this second Government contract, it would provide him cover to move even more funds into Colombia, under the guise of money for the oil pipeline project.

⁶ CS-2 has been a paid law enforcement source since approximately 2008. All actions by CS-2 described herein were taken at the direction of law enforcement officials unless otherwise noted. Information provided by CS-2 has been deemed reliable and has sometimes been corroborated by independent evidence, including recordings and other source information.

ii. CS-1 gave CC-2 a dollar bill (the "Dollar Bill") with a particular serial number (the "Serial Number") printed on it. CS-1 told CC-2 that the Serial Number would operate as the code for them to pass on to SCHIFANO before CS-1 provided SCHIFANO with the first payment for the cocaine shipment from the Colombian DTO.⁷

c. On or about February 9, 2018, CS-1 met with SCHIFANO in the vicinity of Doral, Florida (the "February 9 Meeting"). The February 9 Meeting was video and audio recorded. Based on my review of these recordings and draft translations of the recordings, and my conversations with CS-1, I have learned the following, in substance and in part:

i. SCHIFANO provided CS-1 with the Serial Number from the Dollar Bill. SCHIFANO appeared to have a picture of the Dollar Bill on his phone.

ii. CS-1 then discussed more particulars of the transaction with SCHIFANO. CS-1 told SCHIFANO that the money had already left New York, and should be in the Miami area soon and that three packages of money were wrapped in \$5 million bundles, for the total payment of \$15 million.

iii. Finally, SCHIFANO told CS-1 that SCHIFANO had a friend who had cocaine available if CS-1 was looking to purchase more. SCHIFANO told CS-1 that the friend had cocaine in Puerto Rico, New York, and California, and they discussed possibly partnering on the sale of this cocaine.

d. On or about February 13, 2018, CS-1 and a police officer acting in an undercover capacity ("UC-1") met with SCHIFANO in the vicinity of Miramar, Florida (the "February 13 Meeting"). The February 13 Meeting was video and audio recorded. Based on my review of these recordings and draft translations of these recordings, and my conversations with CS-1 and UC-1, I have learned the following, in substance and in part:

i. CS-1 told SCHIFANO that they were "buying from these guys, 10,000 kilos" and asked SCHIFANO if he could

⁷ Based on my training, experience, and involvement in this investigation and others, I know that it is common practice for individuals to use serial numbers such as this one as passcodes for money laundering operations.

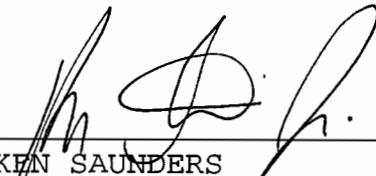
receive the proceeds from the sale of the cocaine in New York, to which SCHIFANO replied in the affirmative.

ii. SCHIFANO then told CS-1 that he was "going to receive the merchandise, count it, verify it and I'm going to Bogota." He then stated that he was "going to talk to my other people in Bogota" regarding proceeds from the sale of the larger quantity of cocaine.


iii. SCHIFANO, UC-1, and CS-1 then further discussed the sale of cocaine from SCHIFANO's own connection.

iv. CS-1 and UC-1 then provided SCHIFANO with a car (the "Car"). In the trunk of the Car was \$5 million in fake United States currency, bundled in clear packages inside a bag. They also discussed where to deliver a second car, with the remaining \$10 million inside. CS-1, UC-1, and SCHIFANO walked together to the trunk of the Car, and SCHIFANO looked inside the trunk, which had a large, open suitcase containing the purported \$5 million inside. SCHIFANO acknowledged that the money was present, and UC-1 handed SCHIFANO the key to the Car. SCHIFANO then took the Car and drove away.

WHEREFORE, I respectfully request that VINCENT SCHIFANO, the defendant, be imprisoned or bailed, as the case may be.


KEN SAUNDERS
Special Agent
Drug Enforcement Administration

Sworn to before me this
9th day of April, 2018.


THE HONORABLE ROBERT W. SEHRBURGER
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

